

February 24, 2012

Ms. Humane L. Zia
Senior Assistant Regional Counsel
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Zia:

Thank you again for meeting with us on Wednesday; Cabot felt the meeting was quite productive and we hope EPA did as well. This letter responds to your February 17, 2012 letter to Jason Hutt regarding the status of Cabot's response to EPA's January 6, 2012 request for information regarding the Dimock area. As we stated in our meeting yesterday, we are in the last stages of completing our production of the requested information. As your letter notes, we have produced over 100,000 pages of documents to date; we anticipate producing the remaining responsive documents to EPA by March 2, 2012.

1. The first points made in your February 17 letter are that, with regard to groundwater sampling data, EPA has not yet received data from samples taken prior to 2010 nor has it received latitude and longitude information for each sample taken. As indicated above, Cabot plans to produce all the remaining data in its possession by the end of next week; this includes the earlier data it possesses. With regard to latitudinal and longitudinal information for each sample point, Cabot will produce the information it has by March 2, 2012.
2. The second item in your February 17 letter refers to the need for Cabot to submit information in EDD format. As we have previously discussed, Cabot will submit the data that is available in EDD format. Cabot intends to produce to EPA the data it possesses by the end of next week. It does not understand that it has a duty to manufacture data not in its possession and will therefore not be doing so for samples for which it does not possess in EDD format.
3. The letter's third paragraph requests a timeline of submittal of the remaining information and an identification of what that information is. It was our understanding, based on discussions between EPA and Cabot's counsel, that EPA was comfortable with Cabot providing data to EPA on a rolling basis, given the quantity of data requested and the short (seven day) timeline in which it was requested. As indicated above, Cabot intends to provide the remaining information in its possession by the end of next week. In the interest

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of expediency, we would prefer simply to provide that information, rather than identify at this time what that information will be. We will be producing a great deal of additional information and are concerned that undertaking the effort required to specifically list that information at this time will significantly delay our timeline for production. Indeed, providing such a list would likely take as much time as providing the documents themselves. Thus, rather than provide the list, we plan to simply provide the documents. Please let us know if you have any concerns with this approach.

4. The final paragraph in the February 17 letter indicates that the February 3 and 10 submissions have not been certified by a responsible Cabot official. We acknowledge this fact. In the interest of expediency, we have sought to produce the data requested as quickly as possible on a rolling basis and therefore have not been certifying each rolling submission. We intend to provide a certification with our final submission at the end of next week that covers all of the submissions that have been made in February. Please let us know if you have any concerns with this approach.

Thank you very much and do not hesitate to contact me with any questions or comments.

Very truly yours,
Bracewell & Giuliani LLP

/s/

Lowell M. Rothschild